

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

_____)	
RUSSIAN RESEARCH CENTER,)	
THE KURCHATOV INSTITUTE)	
)	
Plaintiff,)	
)	
vs.)	
)	Case No.: 02CV3878
WESTERN SERVICES CORPORATION,)	
et al.)	
)	
Defendant,)	
_____)	

**PLAINTIFF'S MOTION TO COMPEL THE DEFENDANTS TO PRODUCE ALL
SOFTWARE AND OUTSTANDING DOCUMENTS IN THEIR CUSTODY AND CONTROL**

Plaintiff Russian Research Center, The Kurchatov Institute ("KI"), by its undersigned attorneys, pursuant to Federal Rule 37(a) and Local Rule 104, hereby files this Motion to Compel, requesting that the Court order the Defendants and Counter-Plaintiffs George Utmel ("Utmel") and Western Services Corporation's ("WSC") to produce computer code and the other documents and items sought but not produced in discovery, as set forth in, and for the grounds stated in, KI's attached Memorandum In Support of Motion to Compel.

Respectfully submitted,

/s/

John M.G. Murphy
Federal Bar No. 03811
Ober, Kaler, Grimes & Shriver
A Professional Corporation
120 East Baltimore Street
Baltimore, Maryland 21202-1643
410-685-1120
410-547-0699 (fax)

Attorneys for Plaintiff